

Barry J. Hebert, PE  
Thomas R. LaSalle, PE/PLS  
Vincent S. Palumbo, II, PE

*CO-LAD 771*  
**HLP** Engineering, Inc.

DEC 02 1999 *CO*



November 29, 1999

U.S. EPA Region VI  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Attn.: Ms. Dorothy Whaley, 6PD-R

**RE: Badger Oil Corporation  
Annual Certification Statement  
Bully Camp Field; "B" Battery Production Facility  
Air Permit No.: 1560-00044-V0**

On behalf of Badger Oil Corporation (Badger), please find enclosed a copy of the referenced statement and associated report. This is being submitted to comply with the Part 70 reporting requirements for the referenced facility. An original has been forwarded to the Louisiana Department of Environmental Quality in Baton Rouge, LA.

If you have any questions or require additional assistance, please do not hesitate to contact me at: (318) 264-9450. All written correspondence should be directed to: **Badger Oil Corporation, P.O. Drawer 52745, Lafayette, LA 70505, Attn.: Mr. Chuck Rutland**

Sincerely,  
**HLP ENGINEERING, INC.**

*Lori L. Maldonado*

Lori L. Maldonado, E.I.

xc.: Mr. Chuck Rutland - Badger

Enclosures

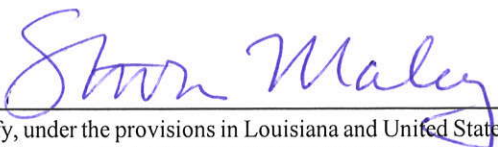
RECEIVED  
DEC 13 1999  
Air Enforcement  
Section 6EN-AA

**Part 70 Annual Compliance Certification**  
**Badger Oil Corporation**  
**Bully Camp Field; "B" Battery Production Facility**  
**Title V Permit No.: 1560-00044-V0 (issued 11/18/98)**

This certification is being submitted in accordance with LAC 33:III.507.H.5 for the time frame of November 18, 1998 (initial permit issuance) through December 31, 1998. It is based on information and belief formed after reasonable inquiry and the investigation into the devices, methods, and activities listed in Table 1 herein.

Badger Oil Corporation is in compliance with all applicable requirements pertaining to the sources covered by the permit that are currently in effect and have been identified in Table 1 (attached), with the exception of the potential deviations and/or qualifications listed in Table 1.

Name: Steve Maley  
(Printed or Typed Name)

Signature and Date:  12/6/99  
I certify, under the provisions in Louisiana and United States law which provide criminal penalties for false statements, that data presented herein is true and correct to the best of my knowledge and belief.

Title: Manager of Operations

Company: Badger Oil Corporation

**Table 1**  
**(Attachment for Annual Compliance Certification; 11/18/98 through 12/31/98)**

<b>Permit Term &amp; Condition</b>	<b>Compliance Status</b>	<b>Continuous or Intermittent Compliance</b>	<b>Method for Determining Compliance</b>	<b>Deviations</b>
Internal Combustion Engines; Federally Enforceable Specific Condition No. 1A (EPNs ENG 003, ENG 004, ENG 005, ENG 010, ENG 011)	In Compliance	Continuous	Visual observations	Readings not documented
Internal Combustion Engines; Federally Enforceable Specific Condition No. 1C (EPNs ENG 003, ENG 004, ENG 005, ENG 010, ENG 011)	In Compliance	Continuous	1998 EIS report compiled and submitted prior to March 31, 1999.	None
Internal Combustion Engines; Federally Enforceable Specific Condition, General Requirement No. 2 (EPNs ENG 003, ENG 004, ENG 005, ENG 010, ENG 011)	In Compliance	Continuous	Sales gas (also used as fuel supply) is periodically check to verify that H <sub>2</sub> S concentrations remain within pipeline specifications. The facility's title V record keeping log documents compliance with or exemption from testing requirements	None
Internal Combustion Engines; State Only Specific Condition No. 1A (EPN: ENG 004)	In Compliance	Continuous	Stack test was performed and results are maintained on site within the facility's title V record keeping log.	None
Internal Combustion Engines; State Only Specific Condition No. 1B (EPN: ENG 004)	In Compliance	Continuous	Semiannual test not required during this reporting period.	None

<b>Permit Term &amp; Condition</b>	<b>Compliance Status</b>	<b>Continuous or Intermittent Compliance</b>	<b>Method for Determining Compliance</b>	<b>Deviations</b>
Glycol Dehydration Units; Federally Enforceable Specific Condition No. 2A (EPN: DHY 001)	In Compliance	Continuous	Visual observations	Readings not documented
Glycol Dehydration Units; Federally Enforceable Specific Condition No. 2B (EPN: DHY 001)	In Compliance	Continuous	Federal emission factors verify PM emissions are less than 0.6 lbs/10 <sup>6</sup> BTU of heat input.	None
Glycol Dehydration Units; Federally Enforceable Specific Condition No. 1A (EPNs DHY 001, GLP 001)	In Compliance	Continuous	1998 EIS report compiled and submitted prior to March 31, 1999.	None
Glycol Dehydration Units; Federally Enforceable Specific Condition General Requirement No. 4 (EPN: GLP 001)	In Compliance	Continuous	The facility's air permit application precalculates VOC & toxic emissions under maximum operating parameters; additional measures would be taken if any parameters are exceeded	None
Glycol Dehydration Units; Federally Enforceable Specific Condition General Requirement No. 5 (EPN DHY 001)	In Compliance	Continuous	The facility's T-V record keeping log precalculates SO <sub>2</sub> emissions based on maximum operating times and using "sweet" natural gas as fuel; additional measures would be taken if any parameters are exceeded	None
Glycol Dehydration Units; State Only Specific Condition No. 2A (EPN: GLP 001)	In Compliance	Continuous	The VOC control efficiency is achieved by piping the still column vent through a condensing unit. In addition, the process includes a glycol pump flash separator where off-gas is captured.	None

<b>Permit Term &amp; Condition</b>	<b>Compliance Status</b>	<b>Continuous or Intermittent Compliance</b>	<b>Method for Determining Compliance</b>	<b>Deviations</b>
Glycol Dehydration Units; State Only Specific Condition No. 2B (EPN: GLP 001)	In Compliance	Continuous	Test results can be found in the original Part 70 Permit Application, prepared by HLP Engineering, Inc.	None
Glycol Dehydration Units; State Only Specific Condition No. 2C (EPN: GLP 001)	In Compliance	N/A	Original T-V permit application was submitted after installation of controls and addressed this modification.	None
Glycol Dehydration Units; State Only Specific Condition No. 2D (EPN: GLP 001)	In Compliance	Continuous	The date & maintenance of the control device, along with the duration of uncontrolled emissions during these events, are documented on-site in the facility's Title V record keeping log.	None
Glycol Dehydration Units; State Only Specific Condition General Requirement No. 4 (EPN: GLP 001)	In Compliance	Continuous	The facility's air permit application precalculates VOC & toxic emissions under maximum operating parameters; additional measures would be taken if any parameters are exceeded	None
Storage Vessels; Federally Enforceable Specific Condition No. 5A (EPNs TNK 001, TNK 002, TNK 003, TNK 004, TNK 005)	In Compliance	Continuous	1998 EIS report compiled and submitted prior to March 31, 1999.	None
Storage Vessels; State Only Specific Condition No. 3A (EPNs TNK 001, TNK 002, TNK 003, TNK 004, TNK 005)	In Compliance	Continuous	The facility's T-V record keeping log (Documents tank size & service)	None

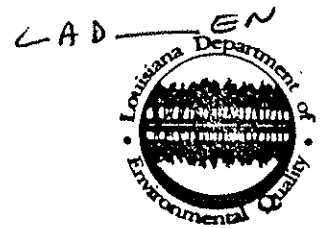
<b>Permit Term &amp; Condition</b>	<b>Compliance Status</b>	<b>Continuous or Intermittent Compliance</b>	<b>Method for Determining Compliance</b>	<b>Deviations</b>
Miscellaneous Equipment; Federally Enforceable Specific Condition No. 1A (EPNs FLR 001, GDP 005, GDP 006, GDP 007, GDP 009, GDP 010, GDP 011, GDP 012, GDP 013, GDP 015, GDP 016, GDP 017, GDP 019, 2-96-GOP, 3-96-GOP, 4-96-GOP, 5-96-GOP, 6-96-GOP, 7-96-GOP, 8-96-GOP)	In Compliance	Continuous	1998 EIS report compiled and submitted prior to March 31, 1999.	None
Fugitive Emissions; Federally Enforceable Specific Condition No. 2B (EPN: FUG 001)	In Compliance	Continuous	Mechanical seals used on applicable equipment.	None
Fugitive Emissions; Federally Enforceable Specific Condition No. 2C (EPN: FUG 001)	In Compliance	Continuous	A Housekeeping Plan was developed to address normal field operations and is maintained on-site.	None
Fugitive Emissions; Federally Enforceable Specific Condition No. 2F (EPN: FUG 001)	In Compliance	Continuous	1998 EIS report compiled and submitted prior to March 31, 1999.	None
Emergency Episodes & Accident Prevention; Federally Enforceable Specific Condition No. 2B ("B" Battery Production Facility)	In Compliance	Continuous	No request was made by the Administrative Authority for a Stand-by Plan during this reporting period.	None

<b>Permit Term &amp; Condition</b>	<b>Compliance Status</b>	<b>Continuous or Intermittent Compliance</b>	<b>Method for Determining Compliance</b>	<b>Deviations</b>
Semi-Annual Monitoring Reports; LAC 33:III.507.H.1 ("B" Battery Production Facility)	Out of Compliance	Intermittent	Semiannual report was compiled and forwarded to the LADEQ in November 1999 to address the reporting period from 11/18/98 to 12/31/98	This semiannual report was due on March 31 <sup>st</sup> , 1999.



EN-LAD865  
**State of Louisiana**

**Department of Environmental Quality**



M.J. "MIKE" FOSTER, JR.  
GOVERNOR

January 28, 2000

J. DALE GIVENS  
SECRETARY

CERTIFIED MAIL (Z 451 736 602)  
RETURN RECEIPT REQUESTED

Mr. Daniel G. Fournierat  
Agent of Service  
102 Versailles Boulevard, Suite 600  
Lafayette, Louisiana 70501

**RE: PETROQUEST ENERGY, INC.  
NOTICE OF POTENTIAL PENALTY  
ENFORCEMENT TRACKING No. AE-PP-99-0267**

Dear Sir:

On or about September 8, 1999, an inspection of the **PETROQUEST BULLY CAMP FACILITY**, owned and/or operated by **PETROQUEST ENERGY, INC.**, was performed to determine the degree of compliance with the Louisiana Environmental Quality Act and Air Quality Regulations. The facility is located in Lafourche Parish approximately 10 miles northwest of Galliano, Louisiana.

While the Department's investigation is not yet complete, the following violation was noted during the course of the inspection:

Barge loading has replaced pipeline transfer as the method of transporting crude oil from the facility. This process change results in air emissions that are not accounted for in the permit. No permit modification was obtained prior to making this process change. This is a violation of LAC 33:III.501.C.2 and La. R.S. 30:2057 (A)(2).

Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for the violation(s) described herein. Written comments may be filed regarding the violation(s) and the contemplated penalty. If you elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice.





PETROQUEST ENERGY, INC.  
NOTICE OF POTENTIAL PENALTY  
Page 2

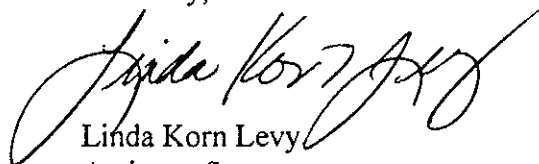
Prior to the issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present any mitigating circumstances concerning the violation(s). If you would like to have such a meeting, please contact Mr. B. J. Pritchard at (225) 765-0872 within ten (10) days after receipt of this **NOTICE OF POTENTIAL PENALTY**.

The Department is required by La. R.S. 30:2025(E)(3)(a) to consider the gross revenues of the Respondent and the monetary benefits of noncompliance in order to determine whether a penalty will be assessed and the amount of such penalty. Please forward Respondent's most current annual gross revenue statement along with a statement of the monetary benefits of noncompliance for the cited violations to the above named contact person within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**. Include with your statement of monetary benefits the method(s) you utilized to arrive at the sum. If you assert that no monetary benefits have been gained, it is requested that you fully justify this statement.

For each violation described herein, the Department reserves the right to seek civil penalties and the right to seek compliance with its rules and regulations in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties and compliance.

To reduce document handling, please refer to the Enforcement Tracking number on the front of this document on all correspondence in response to this action.

Sincerely,



Linda Korn Levy  
Assistant Secretary

LKL/PAF  
ID No. 1560-00088  
AI No. 32317

PETROQUEST ENERGY, INC.  
NOTICE OF POTENTIAL PENALTY  
Page 2

c: Mr. Alfred J. Thomas, III  
Engineering Manager  
PetroQuest Energy, Inc.  
P. O. Box 51205  
Lafayette, Louisiana 70505

Southeast Regional Office  
Michael P. Algero, Sr.

CO-LAD 771  
231 Florida Street, Suite 215  
Baton Rouge, LA 70801  
225-383-8656  
225-383-5990

COMPLETED

Shintaux Environmental Services, Inc..

March 8, 2001

U.S. EPA Region VI  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Attn: Ms. Dorothy Whaley, 6PD-R

Re: Semiannual Monitoring and Annual Compliance Certification  
Llog Exploration Company  
Bully Camp Field; "B" Battery Production Facility  
Air Permit No.: 1560-000440VO

RECEIVED  
MAR 16 2001  
Air/Toxics & Inspection  
Coordination Branch  
6EN-A

On behalf of Llog Exploration Company please find enclosed a copy of the referenced reports. They are being submitted to comply with the Part 70 reporting requirements for the referenced facility. The original has been forwarded to the Louisiana Department of Environmental Quality in Baton Rouge, Louisiana.

If you have any questions or require additional assistance, please do not hesitate to contact me at: 225-383-8656.

Sincerely,

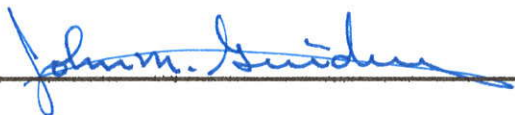
John T. Connolly

Cc: Mr. Chris Allen  
Llog Exploration Company

**Part 70 Annual Compliance Certification**  
**Llog Exploration Company**  
**Bully Camp Field; "B" Battery Production Facility**  
**Title V Permit No. : 1560-00044-VO (issued 11/18/98)**


This certification is being submitted in accordance with LAC 33:III.507.H.5 for the time frame of December 31, 1999 to December 31, 2000. It is based on information and belief formed after reasonable inquiry and investigation into the devices, methods, and activities listed in Table 1. herein.

Llog Exploration Company is in compliance with all applicable requirements pertaining to the sources covered by the permit that are currently in effect and have been identified in Table 1 (attached), with the exception of the potential deviations and/or qualifications listed in Table 1.

 PLANT MANAGER 3/9/01

(Signature and Date)

I certify, under the provisions in Louisiana and the United States law which provide criminal penalties for false statements, that data presented herein is true and correct to the best of my knowledge and belief.



Mr. Christopher Allen

Environmental Manager

Table 1  
Attachment for Annual Compliance Certification

<b><u>PERMIT TERM AND CONDITION</u></b>	<b><u>COMPLIANCE STATUS</u></b>	<b><u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u></b>	<b><u>METHOD FOR DETERMINING COMPLIANCE</u></b>	<b><u>DEVIATIONS</u></b>
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1A (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	Visual observations	Readings not documented
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1B General Requirement No. 2 (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	Sales gas (also used as fuel supply) is Periodically checked to verify that H2S concentrations remain within pipeline specifications. The facility's Title V record keeping log documents compliance with or exemption from testing requirements.	None
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1C (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	1999EIS report compiled and submitted prior to March 31, 2000.	None
Internal Combustion Engines: State Only Specific Condition No. 1A: (EPN's ENG04)	In compliance	Continuous	Stack test was performed and results are maintained on site within the facility's Title V record keeping log.	None
Internal Combustion Engines: State Only Specific Condition No. 1B: (EPN's EN,04)	In compliance	Continuous	Semiannual stack tests are performed and maintained on site with the facility's Title V record keeping log.	None

Table 1  
Attachment for Annual Compliance Certification

<b><u>PERMIT TERM AND CONDITION</u></b>	<b><u>COMPLIANCE STATUS</u></b>	<b><u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u></b>	<b><u>METHOD FOR DETERMINING COMPLIANCE</u></b>	<b><u>DEVIATIONS</u></b>
Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 2A (EPN: DHY001)	In compliance	Continuous	Visual observations	Readings not documented
Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 2B (EPN: DHY001)	In compliance	Contiguous	Federal emission factors verify PM emissions are less than 0.6 lbs/10 <sup>6</sup> BTU of heat input.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 3A (EPN's: DHY001, GLP001)	In compliance	Continuous	1999 EIS report compiled and submitted prior to March 31, 2000.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition General Requirement No. 4 (EPN: GLP001)	In compliance	Continuous	The facility's air permit application precalculates VOC & toxic emissions under maximum operating parameters; additional measures would be taken if any parameters are exceeded.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition General Requirement No. 5 (EPN: DHY001)	In compliance	Continuous	The facility's Title V record keeping log precalculates SO <sub>2</sub> emissions based on maximum operating times and using "sweet" natural gas as fuel; additional measures would be taken if any parameters are exceeded.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2A; (EPN: GLP001)	In compliance	Continuous	The VOC control efficiency is achieved by piping the still column vent through a condensing unit. In addition, the process includes a glycol pump flash separator where	None

Table 1  
Attachment for Annual Compliance Certification

<b><u>PERMIT TERM AND CONDITION</u></b>	<b><u>COMPLIANCE STATUS</u></b>	<b><u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u></b>	<b><u>METHOD FOR DETERMINING COMPLIANCE</u></b>	<b><u>DEVIATIONS</u></b>
Glycol Dehydration Unit: State Only Specific Condition No. 2B; (EPN: GLP001)	In compliance	Continuous	off-gas is captured. Test methods can be found in the original Part 70 Permit Application.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2C(EPN: GLP001)	In compliance	Continuous	Original Title V permit application was submitted after installation of controls and addressed this modification.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2D (EPN: GLP001)	In compliance	Continuous	The date & maintenance of the control device, along with the duration of uncontrolled emissions during these events, are documented on-site in the facility's Title V record keeping log.	None
Glycol Dehydration Unit: State Only Specific Condition General Requirement No. 4 (EPN: GLP001)	In compliance	Continuous	The facility's air permit application precalculates VOC & toxic emissions under maximum operating parameters; additional measures would be taken if any parameters are exceeded.	None
Storage Vessels: Federally Enforceable Specific Condition No. 5A (EPN's: TNK001-005)	In compliance	Continuous	1999 EIS report compiled and submitted prior to March 31, 2000.	None
Storage Vessels: State Only Specific Condition No. 3A (EPN's: TNK001-005)	In compliance	Continuous	The facility's Title V record keeping log documents tank size and service	None

Table 1  
Attachment for Annual Compliance Certification

<b><u>PERMIT TERM AND CONDITION</u></b>	<b><u>COMPLIANCE STATUS</u></b>	<b><u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u></b>	<b><u>METHOD FOR DETERMINING COMPLIANCE</u></b>	<b><u>DEVIATIONS</u></b>
Miscellaneous Equipment: Federally Enforceable Specific Condition No. 2A (EPN's FLR001,GDP005- 006,007,009,010,011,012, 013,015,016,017,019,2-96-GOP, 6-96-GOP, 7-96-GOP, 8-96-GOP)	In compliance	Continuous	1999 EIS report compiled and submitted prior to March 31, 2000.	None
Fugitive Emissions: Federally Enforceable Specific Condition No. 2B; (EPN FUG001)	In compliance	Continuous	Mechanical seals used on applicable equipment.	None
Fugitive Emissions: Federally Enforceable Specific Condition No. 2C; (EPN FUG001)	In compliance	Continuous	A housekeeping plan was developed to address normal field operations and is maintained on-site.	None
Fugitive Emissions: Federally Enforceable Specific Condition No. 2F; (EPN FUG001)	In compliance	Continuous	1999 EIS report compiled and submitted prior to March 31, 2000.	None
Emergency Episodes & Accident Prevention: Federally Enforceable Specific Condition No. 2B (Duck Lake Facility)	In compliance	Continuous	No request was made by the Administrative Authority for a Standby Plan during this reporting period.	None



Table 1  
Attachment for Annual Compliance Certification

<b><u>PERMIT TERM AND CONDITION</u></b>	<b><u>COMPLIANCE STATUS</u></b>	<b><u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u></b>	<b><u>METHOD FOR DETERMINING COMPLIANCE</u></b>	<b><u>DEVIATIONS</u></b>
Semi-Annual Monitoring Reports; LAC 33.III.507.H.1 (Duck Lake Facility)	In compliance	Continuous	Semiannual reports are compiled and forwarded to the LDEQ for each reporting period.	None

**Part 70 Semiannual Report**  
**Llog Exploration Company**  
**Bully Camp Field; "B" Battery Production Facility**  
**Title V Permit No. : 1560-00044-VO (issued 11/18/98)**

This certification is being submitted in accordance with LAC 33:III.507.H.1 for the time frame from July 1, 2000 to December 31, 2000. It is based on information and belief formed after reasonable inquiry and investigation into the devices, methods, and activities listed in Table 1. herein.

Llog Exploration Company is in compliance with all applicable record keeping and monitoring requirements pertaining to the sources covered by the permit which are currently in effect and have been identified in Table 1 (attached), with the exception of the potential deviations and/or qualifications listed in Table 1.

 PLANT MANAGER 3/9/01

(Signature and Date)

I certify, under the provisions in Louisiana and the United States law which provide criminal penalties for false statements, that data presented herein is true and correct to the best of my knowledge and belief.

 \_\_\_\_\_

Mr. Christopher Allen

Environmental Manager

Table 1  
Attachment for Semi Annual Compliance Certification

<b><u>PERMIT TERM AND CONDITION</u></b>	<b><u>COMPLIANCE STATUS</u></b>	<b><u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u></b>	<b><u>METHOD FOR DETERMINING COMPLIANCE</u></b>	<b><u>DEVIATIONS</u></b>
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1A (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	Visual observations	Readings not documented
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1B General Requirement No. 2 (EPN's ENG003,004,005 010,011)	In compliance	Continuous	Sales gas (also used as fuel supply) is Periodically checked to verify that H2S concentrations remain within pipeline specifications. The facility's Title V record keeping log documents compliance with or exemption from testing requirements.	None
Internal Combustion Engines: State Only Specific Condition No. 1A: (EPN's ENG004)	In compliance	Continuous	An initial stack test was not required during this reporting period.	None
Internal Combustion Engines: State Only Specific Condition No. 1B: (EPN's ENG04)	In compliance	Continuous	Semiannual stack tests are performed and maintained on site with the facility's Title V record keeping log.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 2A (EPN: DHY001)	In compliance	Continuous	Visual observations	Readings not documented

Table 1  
Attachment for Semi Annual Compliance Certification

<u>PERMIT TERM AND CONDITION</u>	<u>COMPLIANCE STATUS</u>	<u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u>	<u>METHOD FOR DETERMINING COMPLIANCE</u>	<u>DEVIATIONS</u>
Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 2B (EPN: DHY001)	In compliance	Contiguous	Federal emission factors verify PM emissions are less than 0.6 lbs/10 <sup>6</sup> BTU of heat input.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition General Requirement No. 4 (EPN: GLP001)	In compliance	Continuous	The facility's air permit application precalculates VOC & toxic emissions under maximum operating parameters; additional measures would be taken if any parameters are exceeded.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition General Requirement No. 5 (EPN: DHY001)	In compliance	Continuous	The facility's Title V record keeping log precalculates SO <sub>2</sub> emissions based on maximum operating times and using "sweet" natural gas as fuel; additional measures would be taken if any parameters are exceeded.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2D (EPN: GLP001)	In compliance	Continuous	The date & maintenance of the control device, along with the duration of uncontrolled emissions during these events, are documented on-site in the facility's Title V record keeping log.	None
Glycol Dehydration Unit: State Only Specific Condition General Requirement No. 4 (EPN: GLP001)	In compliance	Continuous	The facility's air permit application precalculates VOC & toxic emissions under maximum operating parameters; additional measures would be taken if any parameters are exceeded.	None

Table 1  
Attachment for Semi Annual Compliance Certification

<b><u>PERMIT TERM AND CONDITION</u></b>	<b><u>COMPLIANCE STATUS</u></b>	<b><u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u></b>	<b><u>METHOD FOR DETERMINING COMPLIANCE</u></b>	<b><u>DEVIATIONS</u></b>
Storage Vessels: Federally Enforceable Specific Condition General Requirement No. 6A (EPN's TNK001-005)	In compliance	Continuous	The facility's Title V record keeping log (documents tank size and service) is maintained on site to verify exemption.	None

AMERADA HESS CORPORATION

2205700044  
LA 0001545771  
P. O. BOX 2040  
HOUSTON, TX 77252-2040  
(713) 609-5000

March 21, 2003

A2/A2/CO  
158

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Louisiana Department of Environmental Quality  
Office of Environmental Compliance  
Surveillance Division  
P. O. Box 82215  
Baton Rouge, Louisiana 70884-2215

RECEIVE

APR 1 2003

Air/Toxics & Inspection  
Coordination Branch  
6EN-A

**Re: FEF - TITLE V AIR PERMIT**  
ANNUAL COMPLIANCE CERTIFICATION  
BULLY CAMP "B" PRODUCTION FACILITY  
PERMIT NO. 1560-00044-VO

Dear Madam/Sir:

Attached please find a completed Title V Permit Annual Compliance Certification for Amerada Hess Corporation's Bully Camp "B" Production Facility. This certification is being submitted to comply with Part 70 reporting requirements of LAC 33:III.507.H.5 and 40 CFR 70.6(a)(3)(iii)(A). The certification covers the time period from January 1, 2002 through December 31, 2002.

If you should have any questions or require additional information, please feel free to contact me at (713) 609-4204.

Sincerely,



Michael D. Ford  
Environmental Coordinator

MDF:BLYCMPT5RPTANN.DOC

**Attachments**

cc: LDEQ Southeast Regional Office  
201 Evans Road, Building #4, Suite #420  
New Orleans, LA 70123-5230

**Ms. Donna Ascenzi**  
Air Enforcement Section 6EN-AA  
Environmental Protection Agency Region VI  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

Action 601 7/19/03 CB

**Part 70 Annual Compliance Certification**  
**Amerada Hess Corporation**  
**Bully Camp Field: "B" Battery Production Facility**  
**Title V Permit No.: 1560-00044-VO (issued 11/18/98)**

RECEIVE

APR 1 2003

Air/Toxics & Inspection  
Coordination Branch  
6EN-A

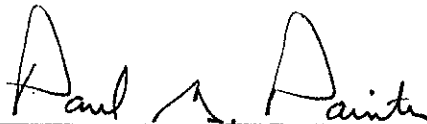
This certification is being submitted in accordance with LAC 33:III.507H.5 for the time frame of January 1, 2002 through December 31, 2002. It so based on information and belief formed after reasonable inquiry and investigation into the devices, methods and activates listed in Table 1 herein.

Amerada Hess Corporation is in compliance with all applicable requirements pertaining to the sources covered by the permit and that are currently in effect and have been identified in Table 1 (attached), with the exception of the potential deviations and/or qualifications listed n Table 1.

Name:  
(Printed or Typed Name)

Paul Painter

Signature and Date:



3-21-03

I certify, under the provisions in Louisiana and United States law which provide criminal penalties for false statements, that data presented herein is true and correct to the best of my knowledge and belief.

Title:

Operations Manager

Company:

Amerada Hess Corporation

Table 1  
Attachment for Annual Compliance Certification

<u>PERMIT TERM AND CONDITION</u>	<u>COMPLIANCE STATUS</u>	<u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u>	<u>METHOD FOR DETERMINING COMPLIANCE</u>	<u>DEVIATIONS</u>
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1A (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	Uses sweet natural gas as fuel	None
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1B General Requirement No. 2 (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	Sales gas (also used as fuel supply) is Periodically checked to verify that H2S concentrations remain within pipeline specifications. The facility's Title V record keeping log documents compliance with or exemption from testing requirements.	None
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1C (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	2001 EIS report compiled and submitted prior to March 31, 2002.	None
Internal Combustion Engines: State Only Specific Condition No. 1A: (EPN's ENG04)	In compliance	Continuous	Stack test was performed and results are maintained on site within the facility's Title V record keeping log.	None
Internal Combustion Engines: State Only Specific Condition No. 1B: (EPN's EN,04)	In compliance	Continuous	Semiannual stack tests are performed and maintained on site with the facility's Title V record keeping log.	None



Table 1  
Attachment for Annual Compliance Certification

<u>PERMIT TERM AND CONDITION</u>	<u>COMPLIANCE STATUS</u>	<u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u>	<u>METHOD FOR DETERMINING COMPLIANCE</u>	<u>DEVIATIONS</u>
Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 2A (EPN: DHY001)	In compliance	Continuous	Uses sweet natural gas as fuel	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 2B (EPN: DHY001)	In compliance	Contiguous	Federal emission factors verify PM emissions are less than 0.6 lbs/10 <sup>6</sup> BTU of heat input.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 3A (EPN's: DHY001, GLP001)	In compliance	Continuous	2001 EIS report compiled and submitted prior to March 31, 2002.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition General Requirement No. 4 (EPN: GLP001)	In compliance	Continuous	The facility's air permit application precalculates VOC & toxic emissions under maximum operating parameters; additional measures would be taken if any parameters are exceeded.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition General Requirement No. 5 (EPN: DHY001)	In compliance	Continuous	The facility's Title V record keeping log precalculates SO <sub>2</sub> emissions based on maximum operating times and using "sweet" natural gas as fuel; additional measures would be taken if any parameters are exceeded.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2A; (EPN: GLP001)	In compliance	Continuous	The VOC control efficiency is achieved by piping the still column vent through a condensing unit. In addition, the process includes a glycol pump flash separator where	None

Table 1  
Attachment for Annual Compliance Certification

<u>PERMIT TERM AND CONDITION</u>	<u>COMPLIANCE STATUS</u>	<u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u>	<u>METHOD FOR DETERMINING COMPLIANCE</u>	<u>DEVIATIONS</u>
Glycol Dehydration Unit: State Only Specific Condition No. 2B; (EPN: GLP001)	In compliance	Continuous	off-gas is captured. Test methods can be found in the original Part 70 Permit Application.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2C(EPN: GLP001)	In compliance	Continuous	Original Title V permit application was submitted after installation of controls and addressed this modification.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2D (EPN: GLP001)	In compliance	Continuous	The date & maintenance of the control device, along with the duration of uncontrolled emissions during these events, are documented on-site in the facility's Title V record keeping log.	None
Glycol Dehydration Unit: State Only Specific Condition General Requirement No. 4 (EPN: GLP001)	In compliance	Continuous	The facility's air permit application precalculates VOC & toxic emissions under maximum operating parameters; additional measures would be taken if any parameters are exceeded.	None
Storage Vessels: Federally Enforceable Specific Condition No. 5A (EPN's: TNK001-005)	In compliance	Continuous	2001 EIS report compiled and submitted prior to March 31, 2002.	None
Storage Vessels: State Only Specific Condition No. 3A (EPN's: TNK001-005)	In compliance	Continuous	The facility's Title V record keeping log documents tank size and service	None

Table 1  
Attachment for Annual Compliance Certification

<u>PERMIT TERM AND CONDITION</u>	<u>COMPLIANCE STATUS</u>	<u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u>	<u>METHOD FOR DETERMINING COMPLIANCE</u>	<u>DEVIATIONS</u>
Miscellaneous Equipment: Federally Enforceable Specific Condition No. 2A (EPN's FLR001,GDP005- 006,007,009,010,011,012, 013,015,016,017,019,2-96-GOP, 6-96-GOP, 7-96-GOP, 8-96-GOP)	In compliance	Continuous	2001 EIS report compiled and submitted prior to March 31, 2002.	None
Fugitive Emissions: Federally Enforceable Specific Condition No. 2B; (EPN FUG001)	In compliance	Continuous	Mechanical seals used on applicable equipment.	None
Fugitive Emissions: Federally Enforceable Specific Condition No. 2C; (EPN FUG001)	In compliance	Continuous	A housekeeping plan was developed to address normal field operations and is maintained on-site.	None
Fugitive Emissions: Federally Enforceable Specific Condition No. 2F; (EPN FUG001)	In compliance	Continuous	2001 EIS report compiled and submitted prior to March 31, 2002.	None
Emergency Episodes & Accident Prevention: Federally Enforceable Specific Condition No. 2B (Duck Lake Facility)	In compliance	Continuous	No request was made by the Administrative Authority for a Standby Plan during this reporting period.	None

Table 1  
Attachment for Annual Compliance Certification

<u>PERMIT TERM AND CONDITION</u>	<u>COMPLIANCE STATUS</u>	<u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u>	<u>METHOD FOR DETERMINING COMPLIANCE</u>	<u>DEVIATIONS</u>
Semi-Annual Monitoring Reports; LAC 33.III.507.H.1	In compliance	Continuous	Semianual reports are compiled and forwarded to the LDEQ for each reporting period.	None

AMERADA HESS CORPORATION

11001338457  
2205200044  
P. O. BOX 2040  
HOUSTON, TX 77252-2040  
(713) 609-5000  
A1/A1/CO

March 26, 2004

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Louisiana Department of Environmental Quality  
Office of Environmental Compliance  
Surveillance Division  
P. O. Box 82215  
Baton Rouge, Louisiana 70884-2215

RECEIVE

MAR 30 2004

Air/Toxics & Inspection  
Coordination Branch  
6EN-A

**Re: FEF - TITLE V AIR PERMIT**  
ANNUAL COMPLIANCE CERTIFICATION  
BULLY CAMP "B" PRODUCTION FACILITY  
PERMIT NO. 1560-00044-VO

Dear Madam/Sir:

Attached please find a completed Title V Permit Annual Compliance Certification for Amerada Hess Corporation's Bully Camp "B" Production Facility. This certification is being submitted to comply with Part 70 reporting requirements of LAC 33:III.507.H.5 and 40 CFR 70.6(a)(3)(iii)(A). The certification covers the time period from January 1, 2003 through December 31, 2003.

If you should have any questions or require additional information, please feel free to contact me at (713) 609-4204.

Sincerely,



Michael D. Ford  
Environmental Coordinator

MDF:BLYCMPT5RPTANN.DOC

Attachments

cc: LDEQ Southeast Regional Office  
201 Evans Road, Building #4, Suite #420  
New Orleans, LA 70123-5230

Ms. Donna Ascenzi  
Air Enforcement Section 6EN-AA  
Environmental Protection Agency Region VI  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

**Part 70 Annual Compliance Certification**  
**Amerada Hess Corporation**  
**Bully Camp Field: "B" Battery Production Facility**  
**Title V Permit No.: 1560-00044-VO (issued 11/18/98)**

This certification is being submitted in accordance with LAC 33:III.507H.5 for the time frame of January 1, 2003 through December 31, 2003. It is based on information and belief formed after reasonable inquiry and investigation into the devices, methods and activities listed in Table 1 herein.

Amerada Hess Corporation is in compliance with all applicable requirements pertaining to the sources covered by the permit that are currently in effect and have been identified in Table 1 (attached), with the exception of the potential deviations and/or qualifications listed in Table 1.

Name:  
(Printed or Typed Name)

Paul Painter

Signature and Date:

 3-26-04

I certify, under the provisions in Louisiana and United States law which provide criminal penalties for false statements, that data presented herein is true and correct to the best of my knowledge and belief.

Title:

Operations Manager

Company:

Amerada Hess Corporation

RECEIVE

MAR 30 2004

Air/Toxics & Inspection  
Coordination Branch  
6EN-A

Table 1  
Attachment for Annual Compliance Certification

<u>PERMIT TERM AND CONDITION</u>	<u>COMPLIANCE STATUS</u>	<u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u>	<u>METHOD FOR DETERMINING COMPLIANCE</u>	<u>DEVIATIONS</u>
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1A (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	Visual observations	None
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1B General Requirement No. 2 (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	Sales gas (also used as fuel supply) is Periodically checked to verify that H2S concentrations remain within pipeline specifications. The facility's Title V record keeping log documents compliance with or exemption from testing requirements.	None
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1C (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	2002 EIS report compiled and submitted prior to March 31, 2003.	None
Internal Combustion Engines: State Only Specific Condition No. 1A: (EPN's ENG04)	In compliance	Continuous	Stack test was performed and results are maintained on site within the facility's Title V record keeping log.	None
Internal Combustion Engines: State Only Specific Condition No. 1B: (EPN's EN,04)	In compliance	Continuous	Semiannual stack tests are performed and maintained on site with the facility's Title V record keeping log.	Semi-annual stack test performed 12/03 indicated high CO emissions. Engine air/fuel ratio adjusted and retested.

Table 1  
Attachment for Annual Compliance Certification

<b><u>PERMIT TERM AND CONDITION</u></b>	<b><u>COMPLIANCE STATUS</u></b>	<b><u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u></b>	<b><u>METHOD FOR DETERMINING COMPLIANCE</u></b>	<b><u>DEVIATIONS</u></b>
Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 2A (EPN: DHY001)	In compliance	Continuous	Visual observations	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 2B (EPN: DHY001)	In compliance	Contiguous	Federal emission factors verify PM emissions are less than 0.6 lbs/10 <sup>6</sup> BTU of heat input.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 3A (EPN's: DHY001, GLP001)	In compliance	Continuous	2002 EIS report compiled and submitted prior to March 31, 2003.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition General Requirement No. 4 (EPN: GLP001)	In compliance	Continuous	The facility's air permit application precalculates VOC & toxic emissions under maximum operating parameters; additional measures would be taken if any parameters are exceeded.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition General Requirement No. 5 (EPN: DHY001)	In compliance	Continuous	The facility's Title V record keeping log precalculates SO <sub>2</sub> emissions based on maximum operating times and using "sweet" natural gas as fuel; additional measures would be taken if any parameters are exceeded.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2A; (EPN: GLP001)	In compliance	Continuous	The VOC control efficiency is achieved by piping the still column vent through a condensing unit. In addition, the process includes a glycol pump flash separator where off-gas is captured.	None



Table 1  
Attachment for Annual Compliance Certification

<b><u>PERMIT TERM AND CONDITION</u></b>	<b><u>COMPLIANCE STATUS</u></b>	<b><u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u></b>	<b><u>METHOD FOR DETERMINING COMPLIANCE</u></b>	<b><u>DEVIATIONS</u></b>
Glycol Dehydration Unit: State Only Specific Condition No. 2B; (EPN: GLP001)	In compliance	Continuous	Test methods can be found in the original Part 70 Permit Application.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2C(EPN: GLP001)	In compliance	Continuous	Original Title V permit application was submitted after installation of controls and addressed this modification.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2D (EPN: GLP001)	In compliance	Continuous	The date & maintenance of the control device, along with the duration of uncontrolled emissions during these events, are documented on-site in the facility's Title V record keeping log.	None
Glycol Dehydration Unit: State Only Specific Condition General Requirement No. 4 (EPN: GLP001)	In compliance	Continuous	The facility's air permit application precalculates VOC & toxic emissions under maximum operating parameters; additional measures would be taken if any parameters are exceeded.	None
Storage Vessels: Federally Enforceable Specific Condition No. 5A (EPN's: TNK001-005)	In compliance	Continuous	2002 EIS report compiled and submitted prior to March 31, 2003.	None
Storage Vessels: State Only Specific Condition No. 3A (EPN's: TNK001-005)	In compliance	Continuous	The facility's Title V record keeping log documents tank size and service	None

Table 1  
Attachment for Annual Compliance Certification

<b><u>PERMIT TERM AND CONDITION</u></b>	<b><u>COMPLIANCE STATUS</u></b>	<b><u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u></b>	<b><u>METHOD FOR DETERMINING COMPLIANCE</u></b>	<b><u>DEVIATIONS</u></b>
Miscellaneous Equipment: Federally Enforceable Specific Condition No. 2A (EPN's FLR001,GDP005- 006,007,009,010,011,012, 013,015,016,017,019,2-96-GOP, 6-96-GOP, 7-96-GOP, 8-96-GOP)	In compliance	Continuous	2002 EIS report compiled and submitted prior to March 31, 2003.	None
Fugitive Emissions: Federally Enforceable Specific Condition No. 2B; (EPN FUG001)	In compliance	Continuous	Mechanical seals used on applicable equipment.	None
Fugitive Emissions: Federally Enforceable Specific Condition No. 2C; (EPN FUG001)	In compliance	Continuous	A housekeeping plan was developed to address normal field operations and is maintained on-site.	None
Fugitive Emissions: Federally Enforceable Specific Condition No. 2F; (EPN FUG001)	In compliance	Continuous	2002 EIS report compiled and submitted prior to March 31, 2003.	None
Emergency Episodes & Accident Prevention: Federally Enforceable Specific Condition No. 2B (Duck Lake Facility)	In compliance	Continuous	No request was made by the Administrative Authority for a Standby Plan during this reporting period.	None

Table 1  
Attachment for Annual Compliance Certification

<b><u>PERMIT TERM AND CONDITION</u></b>	<b><u>COMPLIANCE STATUS</u></b>	<b><u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u></b>	<b><u>METHOD FOR DETERMINING COMPLIANCE</u></b>	<b><u>DEVIATIONS</u></b>
Semi-Annual Monitoring Reports; LAC 33.III.507.H.1 (Duck Lake Facility)	In compliance	Continuous	Semiannual reports are compiled and forwarded to the LDEQ for each reporting period.	None

AI/AI/Co  
AMERADA HESS CORPORATION

116013398457  
2205700044  
P. O. BOX 2040  
HOUSTON, TX 77252-2040  
(713) 609-5000

March 23, 2005

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Louisiana Department of Environmental Quality  
Office of Environmental Compliance  
Surveillance Division  
P. O. Box 82215  
Baton Rouge, Louisiana 70884-2215

**RECEIVE**

MAR 28 2005

Air/Toxics & Inspection  
Coordination Branch  
6EN-A

**Re: FEF - TITLE V AIR PERMIT**  
ANNUAL COMPLIANCE CERTIFICATION  
BULLY CAMP "B" PRODUCTION FACILITY  
PERMIT NO. 1560-00044-VO

Dear Madam/Sir:

Attached please find a completed Title V Permit Annual Compliance Certification for Amerada Hess Corporation's Bully Camp "B" Production Facility. This certification is being submitted to comply with Part 70 reporting requirements of LAC 33:III.507.H.5 and 40 CFR 70.6(a)(3)(iii)(A). The certification covers the time period from January 1, 2004 through December 31, 2004.

If you should have any questions or require additional information, please feel free to contact me at (713) 609-4204.

Sincerely,



Michael D. Ford  
Environmental Coordinator

MDF:BLYCMPT5RPTANN.DOC

**Attachments**

cc: LDEQ Southeast Regional Office  
201 Evans Road, Building #4, Suite #420  
New Orleans, LA 70123-5230

Ms. Donna Ascenzi  
Air Enforcement Section 6EN-AA  
Environmental Protection Agency Region VI  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

**Part 70 Annual Compliance Certification**  
**Amerada Hess Corporation**  
**Bully Camp Field: "B" Battery Production Facility**  
**Title V Permit No.: 1560-00044-VO (issued 11/18/98)**


This certification is being submitted in accordance with LAC 33:III.507H.5 for the time frame of January 1, 2004 through December 31, 2004. It is based on information and belief formed after reasonable inquiry and investigation into the devices, methods and activities listed in Table 1 herein.

Amerada Hess Corporation is in compliance with all applicable requirements pertaining to the sources covered by the permit that are currently in effect and have been identified in Table 1 (attached), with the exception of the potential deviations and/or qualifications listed in Table 1.

Name:  
(Printed or Typed Name)

John Pere

Signature and Date:

 3/23/2005

I certify, under the provisions in Louisiana and United States law which provide criminal penalties for false statements, that data presented herein is true and correct to the best of my knowledge and belief.

Title:

Operations Manager

Company:

Amerada Hess Corporation

**RECEIVE**

MAR 28 2005

Air/Toxics & Inspection  
Coordination Branch  
6EN-ATable 1  
Attachment for Annual Compliance Certification

<u>PERMIT TERM AND CONDITION</u>	<u>COMPLIANCE STATUS</u>	<u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u>	<u>METHOD FOR DETERMINING COMPLIANCE</u>	<u>DEVIATIONS</u>
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1A (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	Visual observations	None
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1B General Requirement No. 2 (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	Sales gas (also used as fuel supply) is Periodically checked to verify that H2S concentrations remain within pipeline specifications. The facility's Title V record keeping log documents compliance with or exemption from testing requirements.	None
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1C (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	2003 EIS report compiled and submitted prior to March 31, 2004.	None
Internal Combustion Engines: State Only Specific Condition No. 1A: (EPN's ENG04)	In compliance	Continuous	Stack test was performed and results are maintained on site within the facility's Title V record keeping log.	None
Internal Combustion Engines: State Only Specific Condition No. 1B: (EPN's EN,04)	In compliance	Continuous	Semiannual stack tests are performed and maintained on site with the facility's Title V record keeping log.	None

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Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 2B (EPN: DHY001)	In compliance	Contiguous	Federal emission factors verify PM emissions are less than 0.6 lbs/10 <sup>6</sup> BTU of heat input.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 3A (EPN's: DHY001, GLP001)	In compliance	Continuous	2003 EIS report compiled and submitted prior to March 31, 2004.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition General Requirement No. 4 (EPN: GLP001)	In compliance	Continuous	The facility's air permit application precalculates VOC & toxic emissions under maximum operating parameters; additional measures would be taken if any parameters are exceeded.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition General Requirement No. 5 (EPN: DHY001)	In compliance	Continuous	The facility's Title V record keeping log precalculates SO <sub>2</sub> emissions based on maximum operating times and using "sweet" natural gas as fuel; additional measures would be taken if any parameters are exceeded.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2A; (EPN: GLP001)	In compliance	Continuous	The VOC control efficiency is achieved by piping the still column vent through a condensing unit. In addition, the process includes a glycol pump flash separator where off-gas is captured.	None

Table 1  
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<b><u>PERMIT TERM AND CONDITION</u></b>	<b><u>COMPLIANCE STATUS</u></b>	<b><u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u></b>	<b><u>METHOD FOR DETERMINING COMPLIANCE</u></b>	<b><u>DEVIATIONS</u></b>
Glycol Dehydration Unit: State Only Specific Condition No. 2B; (EPN: GLP001)	In compliance	Continuous	Test methods can be found in the original Part 70 Permit Application.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2C(EPN: GLP001)	In compliance	Continuous	Original Title V permit application was submitted after installation of controls and addressed this modification.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2D (EPN: GLP001)	In compliance	Continuous	The date & maintenance of the control device, along with the duration of uncontrolled emissions during these events, are documented on-site in the facility's Title V record keeping log.	None
Glycol Dehydration Unit: State Only Specific Condition General Requirement No. 4 (EPN: GLP001)	In compliance	Continuous	The facility's air permit application precalculates VOC & toxic emissions under maximum operating parameters; additional measures would be taken if any parameters are exceeded.	None
Storage Vessels: Federally Enforceable Specific Condition No. 5A (EPN's: TNK001-005)	In compliance	Continuous	2003 EIS report compiled and submitted prior to March 31, 2004.	None
Storage Vessels: State Only Specific Condition No. 3A (EPN's: TNK001-005)	In compliance	Continuous	The facility's Title V record keeping log documents tank size and service	None



Table 1  
Attachment for Annual Compliance Certification

<b><u>PERMIT TERM AND CONDITION</u></b>	<b><u>COMPLIANCE STATUS</u></b>	<b><u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u></b>	<b><u>METHOD FOR DETERMINING COMPLIANCE</u></b>	<b><u>DEVIATIONS</u></b>
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Fugitive Emissions: Federally Enforceable Specific Condition No. 2F; (EPN FUG001)	In compliance	Continuous	2003 EIS report compiled and submitted prior to March 31, 2004.	None
Emergency Episodes & Accident Prevention: Federally Enforceable Specific Condition No. 2B (Duck Lake Facility)	In compliance	Continuous	No request was made by the Administrative Authority for a Standby Plan during this reporting period.	None

Table 1  
Attachment for Annual Compliance Certification

<b><u>PERMIT TERM AND CONDITION</u></b>	<b><u>COMPLIANCE STATUS</u></b>	<b><u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u></b>	<b><u>METHOD FOR DETERMINING COMPLIANCE</u></b>	<b><u>DEVIATIONS</u></b>
Semi-Annual Monitoring Reports; LAC 33.III.507.H.1 (Duck Lake Facility)	In compliance	Continuous	Semiannual reports are compiled and forwarded to the LDEQ for each reporting period.	None

110613398457  
L771  
386385  
V.4  
A1/A1/06  
AMERADA HESS CORPORATION

P. O. BOX 2040  
HOUSTON, TX 77252-2040  
(713) 609-5000

March 22, 2006

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Louisiana Department of Environmental Quality  
Office of Environmental Compliance  
Surveillance Division  
P. O. Box 4312  
Baton Rouge, Louisiana 70821-4312

RECEIVE  
MAR 27 2006  
Air/Toxics & Inspection  
Coordination Branch  
6EN-A

**Re: FEF - TITLE V AIR PERMIT**  
**ANNUAL COMPLIANCE CERTIFICATION**  
**BULLY CAMP "B" PRODUCTION FACILITY**  
**PERMIT NO. 1560-00044-VO**

Dear Madam/Sir:

Attached please find a completed Title V Permit Annual Compliance Certification for Amerada Hess Corporation's Bully Camp "B" Production Facility. This certification is being submitted to comply with Part 70 reporting requirements of LAC 33:III.507.H.5 and 40 CFR 70.6(a)(3)(iii)(A). The certification covers the time period from January 1, 2005 through December 31, 2005.

If you should have any questions or require additional information, please feel free to contact me at (713) 609-4204.

Sincerely,

*Michael D. Ford*

Michael D. Ford  
Environmental Advisor

MDF:BLYCMPT5RPTANN.DOC

**Attachments**

cc: LDEQ Southeast Regional Office  
201 Evans Road, Building #4, Suite #420  
New Orleans, LA 70123-5230

Ms. Donna Ascenzi  
Air Enforcement Section 6EN-AA  
Environmental Protection Agency Region VI  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

Part 70 Annual Compliance Certification  
Amerada Hess Corporation  
Bully Camp Field: "B" Battery Production Facility  
Title V Permit No.: 1560-00044-VO (issued 11/18/98)

RECEIVED  
MAR 27 2006  
Air/Toxics & Inspection  
Coordination Branch  
6EN: A


This certification is being submitted in accordance with LAC 33:III.507H.5 for the time frame of January 1, 2005 through December 31, 2005. It is based on information and belief formed after reasonable inquiry and investigation into the devices, methods and activities listed in Table 1 herein.

Amerada Hess Corporation is in compliance with all applicable requirements pertaining to the sources covered by the permit that are currently in effect and have been identified in Table 1 (attached), with the exception of the potential deviations and/or qualifications listed in Table 1.

Name:  
(Printed or Typed Name)

Paul Painter

Signature and Date:

 3-22-06

I certify, under the provisions in Louisiana and United States law which provide criminal penalties for false statements, that data presented herein is true and correct to the best of my knowledge and belief.

Title:

Operations Manager

Company:

Amerada Hess Corporation

RECEIVE

MAR 27 2006

Table 1  
Attachment for Annual Compliance Certification

Air/Toxics & Inspection  
Coordination Branch  
6EN-A

<u>PERMIT TERM AND CONDITION</u>	<u>COMPLIANCE STATUS</u>	<u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u>	<u>METHOD FOR DETERMINING COMPLIANCE</u>	<u>DEVIATIONS</u>
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1A (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	Visual observations	None
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1B General Requirement No. 2 (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	Sales gas (also used as fuel supply) is Periodically checked to verify that H2S concentrations remain within pipeline specifications. The facility's Title V record keeping log documents compliance with or exemption from testing requirements.	None
Internal Combustion Engines: Federally Enforceable Specific Condition No. 1C (EPN's ENG003,004,005, 010,011)	In compliance	Continuous	2004 EIS report compiled and submitted prior to March 31, 2005.	None
Internal Combustion Engines: State Only Specific Condition No. 1A: (EPN's ENG04)	In compliance	Continuous	Stack test was performed and results are maintained on site within the facility's Title V record keeping log.	None
Internal Combustion Engines: State Only Specific Condition No. 1B: (EPN's EN,04)	In compliance	Continuous	Semiannual stack tests are performed and maintained on site with the facility's Title V record keeping log.	None

Table 1  
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<u>PERMIT TERM AND CONDITION</u>	<u>COMPLIANCE STATUS</u>	<u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u>	<u>METHOD FOR DETERMINING COMPLIANCE</u>	<u>DEVIATIONS</u>
Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 2A (EPN: DHY001)	In compliance	Continuous	Visual observations	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 2B (EPN: DHY001)	In compliance	Continuous	Federal emission factors verify PM emissions are less than 0.6 lbs/10 <sup>6</sup> BTU of heat input.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition No. 3A (EPN's: DHY001, GLP001)	In compliance	Continuous	2004 EIS report compiled and submitted prior to March 31, 2005.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition General Requirement No. 4 (EPN: GLP001)	In compliance	Continuous	The facility's air permit application precalculates VOC & toxic emissions under maximum operating parameters; additional measures would be taken if any parameters are exceeded.	None
Glycol Dehydration Unit: Federally Enforceable Specific Condition General Requirement No. 5 (EPN: DHY001)	In compliance	Continuous	The facility's Title V record keeping log precalculates SO <sub>2</sub> emissions based on maximum operating times and using "sweet" natural gas as fuel; additional measures would be taken if any parameters are exceeded.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2A; (EPN: GLP001)	In compliance	Continuous	The VOC control efficiency is achieved by piping the still column vent through a condensing unit. In addition, the process includes a glycol pump flash separator where off-gas is captured.	None

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Glycol Dehydration Unit: State Only Specific Condition No. 2B; (EPN: GLP001)	In compliance	Continuous	Test methods can be found in the original Part 70 Permit Application.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2C(EPN: GLP001)	In compliance	Continuous	Original Title V permit application was submitted after installation of controls and addressed this modification.	None
Glycol Dehydration Unit: State Only Specific Condition No. 2D (EPN: GLP001)	In compliance	Continuous	The date & maintenance of the control device, along with the duration of uncontrolled emissions during these events, are documented on-site in the facility's Title V record keeping log.	None
Glycol Dehydration Unit: State Only Specific Condition General Requirement No. 4 (EPN: GLP001)	In compliance	Continuous	The facility's air permit application precalculates VOC & toxic emissions under maximum operating parameters; additional measures would be taken if any parameters are exceeded.	None
Storage Vessels: Federally Enforceable Specific Condition No. 5A (EPN's: TNK001-005)	In compliance	Continuous	2004 EIS report compiled and submitted prior to March 31, 2005.	None
Storage Vessels: State Only Specific Condition No. 3A (EPN's: TNK001-005)	In compliance	Continuous	The facility's Title V record keeping log documents tank size and service	None

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Miscellaneous Equipment: Federally Enforceable Specific Condition No. 2A (EPN's FLR001, GDP005- 006,007,009,010,011,012, 013,015,016,017,019,2-96-GOP, 6-96-GOP, 7-96-GOP, 8-96-GOP)	In compliance	Continuous	2004 EIS report compiled and submitted prior to March 31, 2005.	None
Fugitive Emissions: Federally Enforceable Specific Condition No. 2B; (EPN FUG001)	In compliance	Continuous	Mechanical seals used on applicable equipment.	None
Fugitive Emissions: Federally Enforceable Specific Condition No. 2C; (EPN FUG001)	In compliance	Continuous	A housekeeping plan was developed to address normal field operations and is maintained on-site.	None
Fugitive Emissions: Federally Enforceable Specific Condition No. 2F; (EPN FUG001)	In compliance	Continuous	2004 EIS report compiled and submitted prior to March 31, 2005.	None
Emergency Episodes & Accident Prevention: Federally Enforceable Specific Condition No. 2B (Duck Lake Facility)	In compliance	Continuous	No request was made by the Administrative Authority for a Standby Plan during this reporting period.	None



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<b><u>PERMIT TERM AND CONDITION</u></b>	<b><u>COMPLIANCE STATUS</u></b>	<b><u>CONTINUOUS OR INTERMITTENT COMPLIANCE</u></b>	<b><u>METHOD FOR DETERMINING COMPLIANCE</u></b>	<b><u>DEVIATIONS</u></b>
Semi-Annual Monitoring Reports; LAC 33.III.507.H.1 (Duck Lake Facility)	In compliance	Continuous	Semiannual reports are compiled and forwarded to the LDEQ for each reporting period.	None